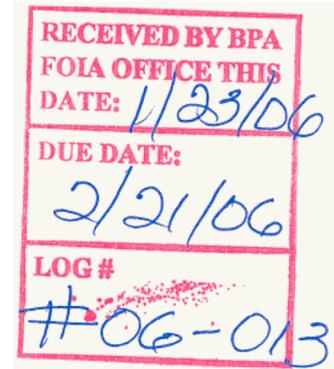


ERIK B. ANDERSON
Admitted in Washington and Alaska
Direct Dial: (206) 521-6559
E-mail: erik.anderson@bullivant.com

January 19, 2006

Christina Brannon
FOIA Officer
Mail Stop DK-7
Bonneville Power Administration
PO Box 3621
Portland, OR 97208



Re: *Mitsui Sumitomo Insurance Co. v. Shaughnessy Heavy Industries*
Our File No. 00201/01890

Dear Ms. Brannon:

This is a request for information under the Freedom of Information Act.

This law firm represents Shaughnessy Heavy Industries in a lawsuit brought by Mitsui Sumitomo Insurance Company to recover amounts paid following an incident involving one of three transformers being shipped to the BPA facility in Wilsonville, Oregon. The details of the transformer are as follows:

| | |
|--------------------------|--|
| Product | 433.333 MVA Transformer/BPA Pearl Substation |
| Fuji Electric Serial No. | 169794T001-1 |
| Purchase Order No. | 00002376 |
| BPA Serial No. | T1782 |
| Date of Loss | August 17, 2002 |

We are requesting copies of the following:

1. All documents relating to the purchase of the subject transformer and its two companion transformers, including but not limited to contracts, correspondence, notes, invoices, purchases orders, specifications, etc.;
2. All documents relating to shipment or transportation of the subject transformer and its two companion transformers, including but not limited to correspondence, notes,

Christina Brannon
January 19, 2006
Page 2

transportation requirements, transportation documents, bills of lading, import documentation, insurance requirements, insurance policies, etc.;

3. All documents regarding investigation of loss, including but not limited to surveys, test reports, expert reports, photographs, descriptions of damage, condition of the subject transformer, repair or salvage, claims documentation, correspondence, notes, etc.; and

4. All documents regarding resolution of the transaction or claim with Sumitomo and/or Fuji, including but not limited to correspondence, notes, rebates, refunds, contracts, renegotiations, amendments, correspondence, and the provision of any replacement transformers, etc.

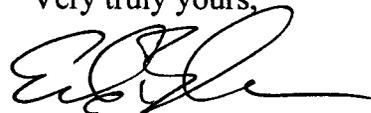
We are willing to pay fees for this request up to a maximum of \$250.00. If you estimate the fees will exceed this number, please inform me first.

My contact information is as follows:

Erik Anderson
Bullivant Houser Bailey
1601 Fifth Avenue, Suite 2300
Seattle, WA 98101
Phone: 206-521-6559
E-mail: erik.anderson@bullivant.com

Thank you for your assistance. If you need additional information, please advise.

Very truly yours,



Erik B. Anderson

EBA:di

cc: Paul Mautner

3476835.1

